

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**DEBORAH R. WONDOLOSKI
AKA DEBORAH R. BAYER**

**Registered Nurse License No. 414874
Nurse Practitioner Certificate No. 95001776
Nurse Practitioner Furnishing Certificate No.
95001776**

Respondent

Case No. 2018-117

OAH No. 2018010840

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reprimand is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **April 23, 2019**.

IT IS SO ORDERED **April 23, 2019**.

A handwritten signature in black ink, reading "Trande Phillips RN". The signature is written in a cursive, flowing style.

Trande Phillips, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 XAVIER BECERRA
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 RITA M. LANE
Deputy Attorney General
4 State Bar No. 171352
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9421
7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

14 **DEBORAH R. WONDOLOSKI; AKA**
15 **DEBORAH R. BAYER**
16 **59322 Donna Mac Place**
Mountain Center, CA 92561

17 **Registered Nurse License No. 414874**
18 **Nurse Practitioner Certificate No. 95001776**
19 **Nurse Practitioner Furnishing Certificate**
20 **No. 95001776**

21 Respondent.

Case No. 2018-117

OAH No. 2018010840

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**

[Bus. & Prof. Code § 495]

22 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
23 entitled proceedings that the following matters are true:

24 PARTIES

25 1. Joseph L. Morris, PhD, MSN, RN (Complainant) is the Executive Officer of the
26 Board of Registered Nursing (Board). He brought this action solely in his official capacity and is
27 represented in this matter by Xavier Becerra, Attorney General of the State of California, by Rita
28 M. Lane, Deputy Attorney General.

2. Respondent Deborah R. Wondoloski; aka Deborah R. Bayer (Respondent) is represented in this proceeding by attorney Brett Nemeth, Esq., whose address is 260 Newport Center Drive, Suite 100, Newport Beach, CA 92260.

3. On or about August 31, 1987, the Board issued Registered Nurse License No. 414874 to Respondent. The Registered Nurse License was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 2018-117, and will expire on March 31, 2019, unless renewed.

4. On or about November 26, 2014, the Board issued Nurse Practitioner Certificate No. 95001776 to Respondent. The Nurse Practitioner Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 2018-117, and will expire on March 31, 2019, unless renewed.

5. On or about January 23, 2015, the Board issued Nurse Practitioner Furnishing Certificate No. 95001776 to Respondent. The Nurse Practitioner Furnishing Certificate was in full force and effect at all times relevant to the charges brought in First Amended Accusation No. 2018-117, and will expire on March 31, 2019, unless renewed.

JURISDICTION

6. First Amended Accusation No. 2018-117 was filed before the Board and is currently pending against Respondent. The First Amended Accusation and all other statutorily required documents were properly served on Respondent on July 3, 2018. Respondent timely filed her Notice of Defense contesting the First Amended Accusation. A copy of First Amended Accusation No. 2018-117 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

7. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in First Amended Accusation No. 2018-117. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order for Public Reproval.

8. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the First Amended Accusation; the right to confront and

1 cross-examine the witnesses against her; the right to present evidence and to testify on her own
2 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
3 production of documents; the right to reconsideration and court review of an adverse decision;
4 and all other rights accorded by the California Administrative Procedure Act and other applicable
5 laws.

6 9. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
7 every right set forth above.

8 CULPABILITY

9 10. Respondent understands and agrees that the charges and allegations in First
10 Amended Accusation No. 2018-117, if proven at a hearing, constitute cause for imposing
11 discipline upon her Registered Nurse License, as well as for her Nurse Practitioner Certificate and
12 Nurse Practitioner Furnishing Certificate.

13 11. For the purpose of resolving the First Amended Accusation without the expense and
14 uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could
15 establish a factual basis for the charges in the First Amended Accusation, and that Respondent
16 hereby gives up her right to contest those charges.

17 12. Respondent agrees that her Registered Nurse License, Nurse Practitioner Certificate
18 and Nurse Practitioner Furnishing Certificate are subject to discipline and she agrees to be bound
19 by the Disciplinary Order below.

20 RESERVATION

21 13. Any admissions made by Respondent herein are only for the purposes of this
22 proceeding, or any other proceedings in which the Board or other professional licensing agency is
23 involved, and shall not be admissible in any other criminal or civil proceeding.

24 CONTINGENCY

25 14. This stipulation shall be subject to approval by the Board of Registered Nursing.
26 Respondent understands and agrees that counsel for Complainant and the staff of the Board may
27 communicate directly with the Board regarding this stipulation and settlement, without notice to
28 or participation by Respondent or her counsel. By signing the stipulation, Respondent

1 understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation
2 prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation
3 as its Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Reapproval
4 shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
5 between the parties, and the Board shall not be disqualified from further action by having
6 considered this matter.

7 15. The parties understand and agree that Portable Document Format (PDF) and facsimile
8 copies of this Stipulated Settlement and Disciplinary Order for Public Reapproval, including PDF
9 and facsimile signatures thereto, shall have the same force and effect as the originals.

10 16. This Stipulated Settlement and Disciplinary Order for Public Reapproval is intended by
11 the parties to be an integrated writing representing the complete, final, and exclusive embodiment
12 of their agreement. It supersedes any and all prior or contemporaneous agreements,
13 understandings, discussions, negotiations, and commitments (written or oral). This Stipulated
14 Settlement and Disciplinary Order for Public Reapproval may not be altered, amended, modified,
15 supplemented, or otherwise changed except by a writing executed by an authorized representative
16 of each of the parties.

17 17. In consideration of the foregoing admissions and stipulations, the parties agree that
18 the Board may, without further notice or formal proceeding, issue and enter the following
19 Disciplinary Order:

20 **DISCIPLINARY ORDER**

21 IT IS HEREBY ORDERED that Registered Nurse License No. 414874, Nurse Practitioner
22 Certificate No. 95001776, and Nurse Practitioner Furnishing Certificate No. 95001776 issued to
23 Respondent Deborah R. Wondoloski; aka Deborah R. Bayer, shall be publicly reapproved by the
24 Board of Registered Nursing under Business and Professions Code section 495 in resolution of
25 First Amended Accusation No. 2018-117, attached as Exhibit A, pursuant to the following
26 conditions.

27 **Coursework.** No later than six months from the effective date of the public reapproval,
28 Respondent, at her own expense, shall enroll, successfully complete and submit verification of

1 course(s) relevant to the practice of registered nursing as specified by the Board. Respondent
2 shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall
3 submit to the Board the original transcripts or certificates of completion for the above-required
4 course(s).

5 **Cost Recovery.** Respondent shall pay to the Board costs associated with the investigation
6 and enforcement of this matter in the amount of \$11,729. Respondent shall be permitted to pay
7 these costs in a payment plan approved by the Board. Pursuant to Code section 125.3,
8 Respondent shall not be allowed to renew her Registered Nurse License, Nurse Practitioner
9 Certificate, or Nurse Practitioner Furnishing Certificate until she pays costs in full.

10 **Full Compliance.** As a resolution of the charges in First Amended Accusation No. 2018-
11 117, this stipulated settlement is contingent upon Respondent's full compliance with all
12 conditions of this Order. If Respondent fails to satisfy any of these conditions, such failure to
13 comply constitutes cause for discipline, including outright revocation, of Respondent's Registered
14 Nurse License, Nurse Practitioner Certificate, and Nurse Practitioner Furnishing Certificate.

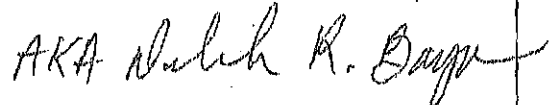
15 ACCEPTANCE

16 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
17 Reproval and have fully discussed it with my attorney, Brett Nemeth. I understand the stipulation
18 and the effect it will have on my Registered Nurse License, Nurse Practitioner Certificate, and
19 Nurse Practitioner Furnishing Certificate. I enter into this Stipulated Settlement and Disciplinary
20 Order for Public Reproval voluntarily, knowingly, and intelligently, and agree to be bound by the
21 Decision and Order of the Board of Registered Nursing.

22
23 DATED: 4/28/19



24 DEBORAH R. WONDOLOSKI; AKA DEBORAH R.
25 BAYER
26 Respondent

AKA Deborah R. Bayer 

1 I have read and fully discussed with Respondent Deborah R. Wondoloski; aka Deborah R.
2 Bayer, the terms and conditions and other matters contained in the above Stipulated Settlement
3 and Disciplinary Order for Public Reapproval. I approve its form and content.

4
5 DATED: 1-29-19


6 BRETT NEMETH
Attorney for Respondent

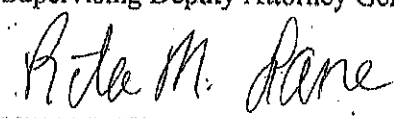
7
8
9 ENDORSEMENT

10 The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby
11 respectfully submitted for consideration by the Board of Registered Nursing of the Department of
12 Consumer Affairs.

13
14 DATED: 1-29-19

Respectfully submitted,

15 XAVIER BECERRA
Attorney General of California
16 GREGORY J. SALUTE
Supervising Deputy Attorney General

17 
18 RITA M. LANE
19 Deputy Attorney General
20 Attorneys for Complainant

21
22
23 SD2017703690

Exhibit A

First Amended Accusation No. 2018-117

1 XAVIER BECERRA
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 RON ESPINOZA
Deputy Attorney General
4 State Bar No. 176908
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9447
7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2018-117

12 DEBORAH R. WONDOLOSKI; AKA
13 DEBORAH R. BAYER
59322 Donna Mae Place
14 Mountain Center, CA 92561

FIRST AMENDED ACCUSATION

15 Registered Nurse License No. 414874
16 Nurse Practitioner Certificate No. 95001776
Nurse Practitioner Furnishing Certificate No.
17 95001776

18 Respondent.

19
20 Complainant alleges:

21 PARTIES

22 1. Joseph L. Morris, PhD, MSN, RN (Complainant) brings this First Amended
23 Accusation solely in his official capacity as the Executive Officer of the Board of Registered
24 Nursing, Department of Consumer Affairs.

25 2. On or about August 31, 1987, the Board of Registered Nursing issued Registered
26 Nurse License Number 414874 to Deborah R. Wondoloski, also known as Deborah R. Bayer
27 (Respondent). The Registered Nurse License was in full force and effect at all times relevant to
28 the charges brought herein and will expire on March 31, 2019, unless renewed.

3. On or about November 26, 2014, the Board of Registered Nursing issued Nurse Practitioner Certificate Number 95001776 to Respondent. The Nurse Practitioner Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2019, unless renewed.

4. On or about January 23, 2015, the Board of Registered Nursing issued Nurse Practitioner Furnishing Certificate Number 95001776 to Respondent. The Nurse Practitioner Furnishing Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2019, unless renewed.

JURISDICTION

5. This First Amended Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

6. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

7. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

STATUTORY PROVISIONS

8. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

". . . .

///

///

(

(

1 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
2 violating of, or conspiring to violate any provision or term of this chapter [the Nursing Practice
3 Act] or regulations adopted pursuant to it.

4 ". . . ."

5 9. Section 2762 of the Code states:

6 "In addition to other acts constituting unprofessional conduct within the meaning of this
7 chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this
8 chapter to do any of the following:

9 "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed
10 physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or
11 administer to another, any controlled substance as defined in Division 10 (commencing with
12 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as
13 defined in Section 4022.

14 ". . ."

15 10. Section 2725.1 of the Code states:

16 "(a) Notwithstanding any other provision of law, a registered nurse may dispense drugs or
17 devices upon an order by a licensed physician and surgeon or an order by a certified nurse-
18 midwife, nurse practitioner, or physician assistant issued pursuant to Section 2746.51, 2836.1, or
19 3502.1, respectively, if the registered nurse is functioning within a licensed primary care clinic as
20 defined in subdivision (a) of Section 1204 of, or within a clinic as defined in subdivision (b) (c),
21 (h), or (i) of Section 1206 of, the Health and Safety Code.

22 "(b) No clinic shall employ a registered nurse to perform dispensing duties exclusively. No
23 registered nurse shall dispense drugs in a pharmacy, keep a pharmacy, open shop, or drugstore for
24 the retailing of drugs or poisons. No registered nurse shall compound drugs. Dispensing of drugs
25 by a registered nurse, except a certified nurse-midwife who functions pursuant to a standardized
26 procedure or protocol described in Section 2746.51 or a nurse practitioner who functions pursuant
27 to a standardized procedure described in Section 2836.1, or protocol, shall not include substances
28 included in the California Uniform Controlled Substances Act (Division 10 (commencing with

Section 11000) of the Health and Safety Code). Nothing in this section shall exempt a clinic from the provisions of Article 13 (commencing with Section 4180) of Chapter 9.

“(c) Nothing in this section shall be construed to limit any other authority granted to a certified nurse-midwife pursuant to Article 2.5 (commencing with Section 2746), to a nurse practitioner pursuant to Article 8 (commencing with Section 2834), or to a physician assistant pursuant to Chapter 7.7 (commencing with Section 3500).

“(d) Nothing in this section shall be construed to affect the sites or types of health care facilities at which drugs or devices are authorized to be dispensed pursuant to Chapter 9 (commencing with Section 4000).”

11. Section 2836.1 of the Code states:

“Neither this chapter nor any other provision of law shall be construed to prohibit a nurse practitioner from furnishing or ordering drugs or devices when all of the following apply:

“(a) The drugs or devices are furnished or ordered by a nurse practitioner in accordance with standardized procedures or protocols developed by the nurse practitioner and the supervising physician and surgeon when the drugs or devices furnished or ordered are consistent with the practitioner's educational preparation or for which clinical competency has been established and maintained.

“(b) The nurse practitioner is functioning pursuant to standardized procedure, as defined by Section 2725, or protocol. The standardized procedure or protocol shall be developed and approved by the supervising physician and surgeon, the nurse practitioner, and the facility administrator or the designee.

“(c)

(1) The standardized procedure or protocol covering the furnishing of drugs or devices shall specify which nurse practitioners may furnish or order drugs or devices, which drugs or devices may be furnished or ordered, under what circumstances, the extent of physician and surgeon supervision, the method of periodic review of the nurse practitioner's competence, including peer review, and review of the provisions of the standardized procedure.

(2) In addition to the requirements in paragraph (1), for Schedule II controlled substance protocols, the provision for furnishing Schedule II controlled substances shall address the diagnosis of the illness, injury, or condition for which the Schedule II controlled substance is to be furnished.

“(d) The furnishing or ordering of drugs or devices by a nurse practitioner occurs under physician and surgeon supervision. Physician and surgeon supervision shall not be construed to require the physical presence of the physician, but does include (1) collaboration on the development of the standardized procedure, (2) approval of the standardized procedure, and (3) availability by telephonic contact at the time of patient examination by the nurse practitioner.

“(e) For purposes of this section, no physician and surgeon shall supervise more than four nurse practitioners at one time.

“(f)

(1) Drugs or devices furnished or ordered by a nurse practitioner may include Schedule II through Schedule V controlled substances under the California Uniform Controlled Substances Act (Division 10 (commencing with Section 11000) of the Health and Safety Code) and shall be further limited to those drugs agreed upon by the nurse practitioner and physician and surgeon and specified in the standardized procedure.

(2) When Schedule II or III controlled substances, as defined in Sections 11055 and 11056, respectively, of the Health and Safety Code, are furnished or ordered by a nurse practitioner, the controlled substances shall be furnished or ordered in accordance with a patient-specific protocol approved by the treating or supervising physician. A copy of the section of the nurse practitioner's standardized procedure relating to controlled substances shall be provided, upon request, to any licensed pharmacist who dispenses drugs or devices, when there is uncertainty about the nurse practitioner furnishing the order.

“(g)

(1) The board has certified in accordance with Section 2836.3 that the nurse practitioner has satisfactorily completed a course in pharmacology covering the drugs or devices to be furnished or ordered under this section.

(2) A physician and surgeon may determine the extent of supervision necessary pursuant to this section in the furnishing or ordering of drugs and devices.

(3) Nurse practitioners who are certified by the board and hold an active furnishing number, who are authorized through standardized procedures or protocols to furnish Schedule II controlled substances, and who are registered with the United States Drug Enforcement Administration, shall complete, as part of their continuing education requirements, a course including Schedule II controlled substances based on the standards developed by the board. The board shall establish the requirements for satisfactory completion of this subdivision.

“(h) Use of the term "furnishing" in this section, in health facilities defined in Section 1250 of the Health and Safety Code, shall include (1) the ordering of a drug or device in accordance with the standardized procedure and (2) transmitting an order of a supervising physician and surgeon.

“(i) "Drug order" or "order" for purposes of this section means an order for medication which is dispensed to or for an ultimate user, issued by a nurse practitioner as an individual practitioner, within the meaning of Section 1306.02 of Title 21 of the Code of Federal Regulations. Notwithstanding any other provision of law, (1) a drug order issued pursuant to this section shall be treated in the same manner as a prescription of the supervising physician; (2) all references to "prescription" in this code and the Health and Safety Code shall include drug orders issued by nurse practitioners; and (3) the signature of a nurse practitioner on a drug order issued in accordance with this section shall be deemed to be the signature of a prescriber for purposes of this code and the Health and Safety Code.”

COST RECOVERY

12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Unlawful Access of Patient Records)

13. Respondent is subject to disciplinary action under Code section 2761, subdivision (a), for unprofessional conduct in that Respondent, without authorization or consent, unlawfully accessed patient medical records. The circumstances are as follows:

14. In or about December 2015, Respondent was working as a registered nurse at Eisenhower Medical Center. During this time, Respondent's husband's ex-wife had received medical care at Eisenhower Medical Center. On December 2, 2015, without her knowledge or consent, Respondent accessed the ex-wife's electronic medical records, even though Respondent was never her nurse. Respondent unlawfully accessed the ex-wife's test results, physician's orders and medical history. This resulted in the unauthorized disclosure of the patient's protected health information (PHI), in violation of the right to privacy (Cal. Const., art. 1, § 1), the Confidentiality of Medical Information Act (Cal. Civ. Code, § 56 et seq.) and the federal Health Insurance Portability and Accountability Act (HIPPA) (45 C.F.R., § 164.502 et seq.)

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct- Unlawful Furnishing of Dangerous Drug)

15. Respondent is subject to disciplinary action under Code section 2761, subdivision (a), and Code section 2762, subdivision (a), for unprofessional conduct in that Respondent unlawfully prescribed and furnished, as a nurse practitioner, a dangerous drug to someone not under her care, and not in accordance with standardized procedures or protocols developed with her supervising physician. The circumstances are as follows:

16. On or about December 23, 2015, Respondent wrote a prescription for a "Z-Pack" (Zithromax)¹ to her step-son, L.W., a minor at the time, when there was no bona fide provider-patient relationship, and failed to obtain consent from L.W.'s mother prior to providing him medical care.

///

¹ "Z-Pack" is a form of the brand-name medication Zithromax, which contains the antibiotic azithromycin. Azithromycin is used to treat different kinds of bacterial infections, and is classified as a dangerous drug under Business and Professions Code section 4022.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

17. Respondent is subject to disciplinary action under Code section 2761, subdivision (a), for unprofessional conduct in that Respondent wrote a prescription for a Schedule II controlled substance at a higher than recommended dosage amount and frequency. The circumstances are as follows:

18. On or about December 23, 2015, Respondent wrote a prescription for Tussionex²- a narcotic cough medicine that contains hydrocodone- to her step-son, L.W., at "take one or two teaspoons every 6 hours as needed for cough." Standard dosage for Tussionex is 1 teaspoon every twelve hours. The *maximum* dosage for Tussionex is 2 teaspoons in a 24-hour period. Respondent wrote a prescription for 3 times the maximum allowable dosage.

DISCIPLINE CONSIDERATIONS

19. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges that on or about October 12, 2005, in a prior criminal proceeding entitled *People v. Deborah Robinson Bayer*, in Riverside County Superior Court, Case Number SWM040609, Respondent was convicted of violating Vehicle Code section 23152(b), driving with a blood alcohol concentration (BAC) of .08 percent or more, a misdemeanor.

20. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant further alleges that on or about August 15, 2002, in a prior criminal proceeding entitled *People v. Deborah Bayer*, in Riverside County Superior Court, Case Number INM125720, Respondent was convicted of violating Vehicle Code section 23152(b), driving with a blood alcohol concentration (BAC) of .08 percent or more, a misdemeanor.

///

///

///

² Tussionex, a brand name for hydrocodone/chlorpheniramine combination suspension, is a Schedule II controlled substance as designated by Health and Safety Code section 11055, subdivision (b)(1)(I), and is a dangerous drug pursuant to Business and Professions Code section 4022. It is a narcotic cough suppressant.

1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 414874 issued to
5 Deborah R. Wondoloski, also known as Deborah R. Bayer;

6 2. Revoking or suspending Nurse Practitioner Certificate Number 95001776 issued to
7 Deborah R. Wondoloski, also known as Deborah R. Bayer;

8 3. Revoking or suspending Nurse Practitioner Furnishing Certificate Number 95001776
9 issued to Deborah R. Wondoloski, also known as Deborah R. Bayer;

10 4. Ordering Deborah R. Wondoloski, also known as Deborah R. Bayer, to pay the Board
11 of Registered Nursing the reasonable costs of the investigation and enforcement of this case,
12 pursuant to Business and Professions Code section 125.3; and,

13 5. Taking such other and further action as deemed necessary and proper.

14
15 DATED: June 29, 2018

for Joseph L. Morris
JOSEPH L. MORRIS, PHD, MSN, RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

16
17
18
19 SD2017703690
20
21
22
23
24
25
26
27
28